

October 20, 2017

Marc Holmes
3133 Spinning Rod Way
Sacramento, CA 95833

Dr. John Callaway, Lead Scientist
Delta Stewardship Council
980 9th Street, Suite 1500
Sacramento California 95814

Dear Dr. Callaway,

I am writing to offer comment on the October 20 meeting regarding the Feasibility of Shore-Based Ballast Water Treatment in California. I represented The Bay Institute as a member of the Advisory Panel established to assist in development of California ballast water standards and, in that capacity, was actively involved in promoting the need for the current study. I am now retired, but have been asked by The Bay Institute to provide my thoughts on this matter to the Delta Stewardship Council.

The need for the study of shore-based ballast water treatment became apparent when a fundamental assumption made during development of California standards proved to be false. That assumption was that effective shipboard treatment methods were on the verge of being brought to market. Based on that assumption, California regulators elected not to study other approaches. As you are aware, that assumption was later demonstrated to be unjustified.

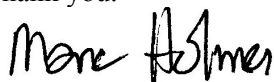
The study being considered at today's meeting goes a long way in answering the question regarding feasibility of a shore-based ballast water treatment approach. Perhaps it goes all the way. Given that this briefing signifies completion of the study, it is curious that there is no conclusory statement included, even provisional, regarding feasibility.

It seems that such a statement is indeed warranted given that information developed by the study supports it. Especially in light of the fact that shipboard treatment systems have been determined by California regulators to be ineffective at achieving California treatment standards, this study appears to confirm that shore-based treatment can indeed meet those standards.

There are, of course, additional considerations for both regulators and shippers regarding how they propose to respond to this information. However, for California regulators it is clear from the study that shore-based treatment is feasible. Indeed, it is the only feasible treatment method capable of meeting the California standard.

I recommend that a concise conclusion of feasibility be included in the study as the information developed over its course warrants.

Thank you.

A handwritten signature in black ink that reads "Marc Holmes". The signature is written in a cursive, flowing style.

Marc Holmes
on behalf of The Bay Institute